Page 1 of 2

Robert L. Powley (RP 7674) James M. Gibson (JG 9234) Law Office of Robert L. Powley, P.C. 417 Canal Street, 4th Floor New York, New York 10013 Telephone: (212) 226-5054 Attorneys for Defendant RICHARD WOLFE

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

GOOGLE INC., CV-05-1779 (TCP) (ETB) a Delaware corporation, Plaintiff/Counter-Defendant v. RICHARD WOLFE d/b/a FROOGLES.COM, an individual, Defendant/Counterclaimant

JOINT MOTION REQUESTING AN EXTENSION OF TIME TO COMPLETE FACT DISCOVERY

Plaintiff/Counter-Defendant, Google Inc. and Defendant/Counterclaimant, Richard Wolfe d/b/a Froogles.com, hereby jointly submit this motion to the Court for an extension of time of the deadline to complete fact discovery in the above-captioned action. Pursuant to the Order of the Honorable Judge E. Thomas Boyle dated April 11, 2006, the current deadline to complete fact discovery is June 15, 2006.

Page 2 of 2

The parties jointly request that the deadline be extended by a period of two (2) months, up to and including August 15, 2006. This is the second request to extend the time for the parties to complete fact discovery. The parties believe there is good cause for requesting this extension as they are diligently working on completing discovery, and are attempting to schedule mediation to resolve the issues underlying this lawsuit.

Dated:	May 1	19,	20	06
--------	-------	-----	----	----

By:

Robert L. Powley, Esq. (RP 7674) Japres M. Gibson, Esq. (JG 9234) Law Office of Robert L. Powley, P.C.

417 Canal Street, 4th Floor New York, New York 10013 Telephone: (212) 226-5054 Attorneys for Defendant, RICHARD WOLFE

By:

Andrew P. Bridges (pro hac vice) Virginia R. Richard, Esq. (VR 6294) Lana Marina, Esq. (LM 1667) Jenning Kohlberger, Esq. (JK 1549) WINSTON & STRAWN LLP 200 Park Avenue New York, NY 10016

Telephone: 212 294 6700 Attorneys for Plaintiff, GOOGLE, INC.

•	O	 _	 нι	~	ы.	

U.S. Magistrate Judge Boyle

Date